United States Department of Agriculture

Foreign Agricultural Service

International Funds Control Reporting System (IFCRS)

Privacy Impact Assessment

Version 1.0

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1.0 Introduction

The USDA is responsible for ensuring the privacy, confidentiality, integrity, and availability of customer and employee information. Privacy protection is both a personal and fundamental right of USDA customers and employees. Among the most basic of customers and employees' rights is an expectation that USDA will protect the confidentiality of personal, financial, and employment information. Customers and employees also have the right to expect that USDA will collect, maintain, use, and disseminate identifiable personal information and data only as authorized by law and as necessary to carry out agency responsibilities.

The Privacy Impact Assessment (PIA) is a process used to evaluate privacy concerns and safeguards in computer application systems. The PIA should be initiated in the early stages of the development of a system and completed as part of the required System Life Cycle (SLC) and security reviews. Privacy is one component of system confidentiality and must be considered when requirements are being analyzed and decisions are being made about data usage and system design. A PIA describes the system and its data, any specific privacy concerns, and safeguards established to meet privacy needs. The USDA Privacy Coordinator must be involved in the PIA process.

1.1 System Description

The International Funds Control Reporting System (IFCRS) is a major tool in providing the FAS with specialized reports and for providing management reports down to the sub-organizational level, as well as supporting reimbursable agreements with the Agency for International Development (AID). IFCRS is also a critical link between the Department of State and USDA's Foundation Financial Information System (FFIS). In addition, IFCRS includes the ability to process Department of State data and enter it into FFIS, and provide the Agency's need for specialized data manipulation and reporting to manage and support reimbursable agreements with AID and others, and for management reports down to the sub-organizational level.

While official accounting functions are handled by the National Finance Center in New Orleans, FAS maintains detailed data in order to efficiently manage fiscal operations and control funds. Users of the system include the Financial Management Division (FMD) employees, employees of FAS' ICD program area, employees of the FAS Budget Office, and support personnel in the Farm Service Agency.

2.0 Privacy Impact Questionnaire

2.1 System Data

1. Generally describe the information to be used in the system in each of the following categories: Customer, Employee, and Other.	Financial management data
2a. What are the sources of the information in the system?	Documents provided by customers and other offices; State Department data
2b. What USDA files and databases are used? What is the source agency?	FFIS, FDW, Reporting Center

2c. What Federal Agencies are providing data for use in the system?	State Department, USAID, other USDA agencies
2d. What State and Local Agencies are providing data for use in the system?	N/A
2e. From what other third party sources will data be collected?	N/A
2f. What information will be collected from the customer/employee?	Name and address; SSN/Tax ID; invoice number; bank routing number/ABA; swift codes; account class number
3a. How will data collected from sources other than the USDA records and the customer be verified for accuracy?	Documents received are matched up against vendor database. SSN and tax ID are verified.
3b. How will data be checked for completeness?	Automated edit checks, review by certifying officers.

2.2 Data Access

1. Who will have access to the data in the system (Users, Managers, System Administrators, Developers, Other)?	Financial management staff
2. How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?	Username/password to restrict capability as well as security profile.
3. Will users have access to all data on the system or will the user's access be restricted? Explain.	No
4. What controls are in place to prevent the misuse (e.g. browsing, unauthorized use) of data by those having access?	Separation of duties, supervisory review, security training

5a. Do other systems share data or have access to data in this system? If yes, explain.	No
5b. Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface.	N/A
6a. Will other agencies share data or have access to data in this system (International, Federal, State, Local, and Other)?	No
6b. How will the data be used by the agency?	N/A
6c. Who is responsible for assuring proper use of the data?	N/A

2.3 Data Attributes

1. Is the use of the data both relevant and necessary to the purpose for which the system is being designed?	Yes
2a. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected?	Yes
2b. Will the new data be placed in the individual's record (customer or employee)?	Potentially in a separate area (compliance review)
2c. Can the system make determinations about customers or employees that would not be possible without the new data?	No
2d. How will the new data be verified for relevance and accuracy?	The new data is reviewed.

3a. If data is being consolidated, what controls are in place to protect the data from unauthorized access or use?	N/A, there is no data being consolidated.
3b. If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain.	N/A, there are no processes being consolidated.
4a. How will the data be retrieved? Can it be retrieved by personal identifier? If yes, explain.	Yes – by SSN for authorized Budget and Finance personnel only. All other users do not have access to this information.
4b. What are the potential effects on the due process rights of customers and employees of: • consolidation and linkage of files and systems; • derivation of data • accelerated information processing and decision making; • use of new technologies.	None
4c. How are the effects to be mitigated?	By review

2.4 Maintenance of Administrative Controls

1a. Explain how the system and its use will ensure equitable treatment of customers and employees.	Does not make decisions based on non-monetary factors.
2a. If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?	Only one site
2b. Explain any possibility of disparate treatment of individuals or groups.	N/A
2c. What are the retention periods of data in this system?	10 years

2d. What are the procedures for eliminating the data at the end of the retention period? Where are the procedures documented?	Data is purged electronically
2e. While the data is retained in the system, what are the requirements for determining if the data is still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?	There are no requirements; whereas, data is accurate as first input.
3a. Is the system using technologies in ways that the USDA has not previously employed (e.g. Caller-ID)?	N/A
3b. How does the use of this technology affect customer/employee privacy?	N/A
4a. Will this system provide the capability to identify, locate, and monitor individuals? If yes, explain.	No
4b. Will this system provide the capability to identify, locate, and monitor groups of people? If yes, explain.	No
4c. What controls will be used to prevent unauthorized monitoring?	Security Training
5a. Under which Systems of Record notice (SOR) does the system operate? Provide number and name.	After research and contact with the Privacy Act official, the System of Record could not be determined.
5b. If the system is being modified, will the SOR require amendment or revision? Explain.	Undetermined

3.0 Summary

This assessment describes the privacy concerns of the IFCRS infrastructure and its data. As privacy is one the components of system confidentiality this PIA must be considered anytime requirements are being analyzed and decisions are being made about data usage, security and system design**.**